

1 BRYAN J. MCCORMACK (SBN 192418)
bryan@mcelawfirm.com

2 **MCCORMACK & ERLICH, LLP**

150 Post Street, Suite 742

3 San Francisco, CA 94108

Telephone: (415) 296-8420

4 Facsimile: (415) 296-8552

5 Attorneys for Plaintiff
JAMES HERNANDEZ

6 ROGER M. MANSUKHANI (SBN: 164463)

rmansukhani@grsm.com

7 CRAIG D. NICKERSON (SBN: 215067)

8 cnickerson@grsm.com

MARSHALL R. LURTZ (SBN: 296254)

9 mlurtz@grsm.com

GORDON REES SCULLY MANSUKHANI, LLP

10 633 West Fifth Street, 52nd Floor

Los Angeles, CA 90071

11 Telephone: (213) 576-5092

Facsimile: (213) 680-4470

12 Attorneys for Defendant
13 BAKER CONCRETE CONSTRUCTION, INC.

14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16

17 JAMES HERNANDEZ

18 Plaintiff,

19 v.

20 BAKER CONCRETE
CONSTRUCTION, INC., a Ohio
21 Corporation,

22 Defendants.
23

CASE NO.: 4:18-cv-03226-HSG

*Assigned to Hon. Judge Haywood S.
Gilliam, Jr.*

**STIPULATED SCHEDULING
ORDER**

Complaint Filed: May 30, 2018

The parties, James Hernandez (“Plaintiff”) and Baker Concrete Construction, Inc. (“Defendant” or “Baker”), through undersigned counsel of record, hereby propose the following Stipulated Scheduling Order:

PROPOSED SCHEDULE OF PRETRIAL AND TRIAL DATES

Matter	Deadline	Parties’ Request
Last Day to Comply with General Order 71	Scheduling Conference Date Plus 38 days	October 5, 2018
Last Day to File Motions to Add Parties and Amend Pleadings	Scheduling Conference Date plus 60 Days	October 29, 2018
Last Day to Conduct Settlement Proceedings	Scheduling Conference Date plus 120 Days	December 26, 2018
Fact Discovery Cut-Off	18 weeks before the Final Pretrial Conference (“FPTC”)	January 25, 2019
Last Day to Serve Initial Expert Reports	16 weeks before the FPTC	April 23, 2019
Disposition Hearing Deadline (except <i>Daubert</i> and all other Motions in Limine)	16 weeks before the FPTC	April 23, 2019
Last Day to Serve Rebuttal Expert Reports	12 weeks before the FPTC	May 21, 2019
Expert Discovery Cut-Off	8 weeks before the FPTC	June 18, 2019
Last Day to File <i>Daubert</i> Motions	7 weeks before the FPTC	June 25, 2019

Matter	Deadline	Parties' Request
Last Day to File Motions in Limine (other than <i>Daubert</i> Motions)	4 weeks before the FPTC	July 16, 2019
Final Pre-Trial Conference	FPTC	August 13, 2019
Trial	Trial	August 26, 2019

Dated: September 11, 2018

GORDON REES SCULLY MANSUKHANI

By: */s/ Marshall R. Lurtz*_____
 Roger M. Mansukhani
 Craig D. Nickerson
 Marshall R. Lurtz
 Attorneys for Defendant
 Baker Concrete Construction, Inc.

Dated: September 11, 2018

McCormack and Erlich, LLP

By: */s/ Bryan J. McCormack*_____
 Bryan J. McCormack
 Attorneys for Plaintiff
 James Hernandez

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

5
6
7

8
9

0

1

2

3

4

5

6

7

8

9

20

21

22

23

4

5

6

27

28